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August 31, 2018

**BY E-FILING & HAND DELIVERY**

The Honorable Leonard P. Stark  
U.S. District Court for the District of Delaware  
844 N. King Street, Unit 26, Room 6124  
Wilmington, Delaware 19801

**Re: *Crystallex Int’l Corp. v. Bolivarian Republic of Venezuela,*  
C.A. No. 17-mc-00151-LPS**

Dear Chief Judge Stark:

We write on behalf of non-parties Phillips Petroleum Company Limited and ConocoPhillips Petrozuata B.V. (together, “ConocoPhillips”). We write in response to the Court’s August 23, 2018 Order regarding the potential execution by Crystallex International Corp. (“Crystallex”) on the equity shares of PDV Holding, Inc. (“PDVH”) owned by Petróleos de Venezuela, S.A. (“PDVSA”). We respectfully request that the Court refrain from permitting execution by Crystallex on PDVSA’s assets during the pendency of further proceedings in the United States Court of Appeals for the Third Circuit.

The propriety of Crystallex’s attempt to execute its judgment (which is against the Republic of Venezuela) against PDVSA’s assets is now pending before the Third Circuit (through Crystallex’s appeal of this Court’s Order of August 9, 2018 and its petition for a writ of mandamus from this Court’s Order of August 23, 2018). If the Third Circuit rules that Crystallex is not entitled to levy on PDVSA assets, the result will be that such assets should have been available to creditors of PDVSA (such as ConocoPhillips) in the first place. However, if Crystallex is allowed to execute on them now, the resulting proceedings for Crystallex to monetize those shares (and potential litigation as between Crystallex and other creditors who purport to have a lien on those shares) will needlessly complicate the situation.

The Honorable Leonard P. Stark

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Thus, we suggest that the most prudent course would be for the Court to maintain the *status quo* and not permit execution by Crystallex on PDVSA's assets during the pendency of the appeal / mandamus proceedings before the Third Circuit.

Respectfully submitted,

*/s/ Garrett B. Moritz*

Garrett B. Moritz (#5646)

cc: All Counsel of Record